

1 (2) Pages  
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10 **UNITED STATES BANKRUPTCY COURT**  
 11 **EASTERN DISTRICT OF CALIFORNIA**  
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 13

10 In re:	)	Case No: 18-13252-A-13
11 JENNIFER SILVA	)	Chapter 13
	)	
	)	
12	)	DC No.: SL-2
	)	
	)	
14 Debtor(s)	)	Date: November 01, 2018
	)	Time: 9:00 a.m.
	)	Dept.: A
15	)	Place: Courtroom 11, 5 <sup>th</sup> Floor
	)	2500 Tulare St.
16	)	Fresno, California 93721
	)	Judge: Honorable Fredrick E. Clement

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 18 **MOTION TO VALUE COLLATERAL OF SN SERVICING CORPORATION**

19 TO: SN SERVICING CORPORATION.

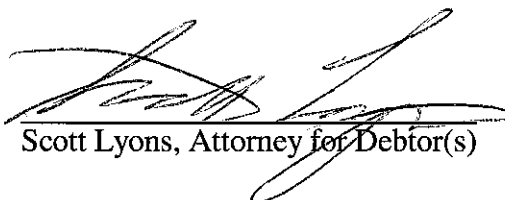
20 You are hereby notified that the debtor(s), under 11 U.S.C. section 506(a) and (d), Federal  
 21 Rule of Bankruptcy Procedure 3012, General Order No. 05-03, as amended by General Order No.  
 22 06-01, paragraph 3(b), Zimmer v. PSB Lending Corp. (In re Zimmer), 313 B.R. 1220 (9<sup>th</sup> Cir.  
 23 2002) and Lam v. Investors Thrift (In re Lam), 221 B.R. 36, 40-41 (B.A.P. 9<sup>th</sup> Cir. 1997), will, and  
 24 does, move this court for an order: 1) valuing the property described in the motion to value  
 25 collateral attached to the debtor(s)' chapter 13 plan at the value in the motion; 2) determining that  
 26 this creditor's claim is wholly unsecured; 3) treating this creditor's claim as an allowed general  
 27 unsecured claim provided for under the chapter 13 plan. Absent a timely setting of hearing and a  
 28 procedurally proper objection, the court may confirm the chapter 13 plan and grant the motion(s)

1 to value collateral and avoid lien(s) without a hearing. The chapter 13 plan and Schedule A are  
2 attached to the exhibits supporting this motion, and incorporated by reference into this motion.

3 WHEREFORE, the debtor(s) pray(s) that:

- 4 1) the court value the collateral of SN Servicing Corporation, at the amount set forth  
5 in the chapter 13 plan, and Schedule A;  
6 2) the court determine that this creditor's claim is wholly unsecured  
7 3) deem this creditor's claim is as an allowed general unsecured claim provided for  
8 under the chapter 13 plan; and  
9 4) for any relief that this court deems just and proper.

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12  
13 Dated: 10-3-18

  
Scott Lyons, Attorney for Debtor(s)